

Magistrate Judge Mary Alice Theiler

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA

Plaintiff,

v.

RAUL ANDRES BOJORQUEZ

a/k/a Raul Andres Bojorquez-Mimerza,

Defendant.

CASE NO. MJ16-88 MAT

COMPLAINT for VIOLATION

BEFORE, United States Magistrate Judge Mary Alice Theiler, United States
Magistrate Judge, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

(Conspiracy to Commit Money Laundering)

Beginning at a time unknown, and continuing until on or about February 25, 2016 in the Western District of Washington and elsewhere, RAUL ANDRES BOJORQUEZ, a/k/a Raul Andres Bojorquez-Mimerza, and others known and unknown, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other to

COMPLAINT/BOJORQUEZ-1

UNITED STATES ATTORNEY
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1 commit certain money laundering offenses under Title 18, United States Code,
2 Section 1956, as follows:

3 (1956(a)(1))

4 (1) Did conduct and attempt to conduct financial transactions, that is:
5 transactions involving the movement of funds by wire and other means affecting
6 interstate and foreign commerce, and transactions involving the use of a financial
7 institution which is engaged in and affects interstate and foreign commerce, which in fact
8 involved the proceeds of specified unlawful activity, that is, conspiracy to distribute
9 controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1),
10 841(b)(1)(A), and 846, knowing that the property involved in the financial transactions
11 represents the proceeds of some form of unlawful activity --

12 (B) knowing that the transactions are designed in whole or in part --

13 (i) to conceal and disguise the nature, the location, the source, the
14 ownership, and the control of the proceeds of the specified unlawful activity, in violation
15 of Title 18, United States Code, Section 1956(a)(1)(B)(i);

16 All in violation of Title 18, United States Code, Section 1956(h).

17
18 **And the complainant states that this Complaint is based on the following**
19 **information:**

20 I, NICOLE RICHARDSON, being first duly sworn on oath, depose and say:

21 1. I am a Deputy with the Snohomish County Sheriff's Office and have been a
22 law enforcement officer since October 1997. From 2003 until present, I have been
23 assigned to the Snohomish Regional Drug Task Force. As of January 2012, I was
24 assigned as a sworn Task Force Officer (TFO) to the Homeland Security Investigations
25 controlled substances and bulk cash smuggling group in Seattle, Washington. While
26 employed with Snohomish County Sheriff's Office, I have attended numerous training
27 courses, including the Drug Enforcement Administration (DEA) Basic Narcotics
28 Investigators course, DEA Clandestine Laboratory Training, California Narcotic

1 Investigators Training Courses, and many specialized courses in narcotics trafficking
2 investigations. In addition, I have participated in hundreds of drug investigations and
3 multiple wire intercept cases. Due to this experience and training, I am familiar with
4 common methods of investigating drug trafficking and manufacturing organizations, and
5 have become familiar with the methods of operation of drug traffickers and
6 manufacturers, including, but not limited to: their methods of importing, exporting,
7 storing, concealing, and packaging drugs; their methods of transferring and distributing
8 drugs, their use of cellular telephones and telephone pagers; their use of numerical codes,
9 code words, and counter-surveillance; and other methods of avoiding detection of law
10 enforcement. I am also familiar with the various methods of packaging, delivering,
11 transferring, and laundering drug proceeds. I am trained to use a field test kit to identify
12 the presumptive presence of controlled substances.

13 2. I have also served as the case detective or co-case detective on several long-
14 term Federal Investigations where parallel financial investigations have been
15 implemented. I have attended money laundering courses and a Parallel Financial and
16 Criminal Investigations training class. I am familiar with the ways in which drug
17 traffickers use businesses, real estate purchases, vehicle transactions, banking
18 transactions, false employment, and monetary instruments to conceal and launder their
19 proceeds derived from illegal drug trafficking. I also know from training and experience
20 that the criminal proceeds made through drug trafficking is spent, deposited, loaned,
21 traded, or transferred through financial institutions, businesses, and persons. This
22 transaction of criminal proceeds is necessary for the drug trafficker to benefit financially
23 from the illegal activity and allows them to finance some or all of their living expenses.

24 3. The recitation of facts below does not include everything known to me
25 about this investigation, this crime, or this Defendant. I have only included sufficient
26 facts necessary to establish probable cause that this Defendant committed the crime
27 charged in this Complaint. Significant additional details have been omitted for the sake
28 of brevity, as this has been a very long and complex investigation.

SUMMARY OF THE INVESTIGATION

2 4. Investigators believe Raul Andres BOJORQUEZ is a large scale money
3 launderer working for an international Money Laundering Operation (MLO) operating
4 throughout several regions of the United States. The investigation to date has established
5 that BORJOQUEZ and others travel to various regions across the United States,
6 including to this judicial District. While at these various locations, these individuals
7 collect suspected illegal drug proceeds in cash. They then deposit the cash proceeds into
8 various bank accounts at different Wells Fargo banks. The proceeds are then withdrawn
9 at bank branches along the Mexican border (to include specifically Nogales, AZ), and/or
10 wire transferred to recipients in Mexico. BOJORQUEZ and the other couriers then return
11 to Arizona and/or Mexico where they reside. The transactions are conducted by third
12 parties (not the drug traffickers) in a manner specifically designed to conceal and disguise
13 from the banks and law enforcement the true ownership, control, intended destination,
14 and illegal source of the funds.

15 5. The initial information about this MLO was derived from separate
16 investigations into two related Drug Trafficking Organizations (DTOs): one of which is
17 referred to herein as the Target DTO. Both DTOs were suspected of smuggling
18 methamphetamine and heroin into the United States from Mexico for distribution in the
19 Pacific Northwest and elsewhere. Both organizations were also suspected of sending
20 drug proceeds back to Mexico. As set forth below, the Target DTO is believed to be just
21 one of the organizations for which this MLO launders drug proceeds.

Summary of Prior Investigation and Cooperating Source's Reliability

25 6. I assisted in a prior Homeland Security Investigations (HSI) drug
26 trafficking investigation, which culminated in the indictment and convictions of dozens
27 of individuals in 2012. That investigation led to agents being able to contact and

1 cultivate a number of new Confidential Sources (CSs) who have provided information
 2 about another, closely related Drug Trafficking Organization now operating in the
 3 Western District of Washington and elsewhere (the Target DTO). Their information has
 4 proven reliable.

5 7. Based on this CS information, Agents and Investigators from Homeland
 6 Security, the Drug Enforcement Administration (DEA), and I are currently conducting an
 7 investigation into this Target DTO's activities. Domestically, the Target DTO is headed
 8 by a Mexican citizen living in Western Washington. The other DTO leader resides in
 9 Mexico. The DTO sends heroin and methamphetamine from Mexico, through Arizona
 10 and California, up into Washington State where it is sold. The Washington members of
 11 the DTO then send the illicit drug sale proceeds back to the DTO members in Mexico, so
 12 that they may obtain more drugs and continue their criminal enterprises.

13 8. Specifically, among others, *Cooperating Source-6* (CS-6), provided
 14 investigators with intimate details regarding the Target DTOs drug operation in
 15 Washington State at the time of his/her debrief.¹ This information included the location
 16 of the main suspected drug stash house in Washington at that time and frequency of drug
 17 deliveries to the stash house. CS-6 was personally aware of this information from his/
 18 her previous dealings with the Target DTO. Verification of much of this information was
 19 achieved through database and records checks, surveillance by Agents, police reports and
 20 comparison to information previously given by other Confidential Sources. For example,
 21 Agents have verified the names of the individuals provided by CS-6, and their residences,
 22 and many of their vehicles.

23 9. Specifically, CS-6 told Agents/ Investigators that the primary Target DTO
 24 drug and money "stash house" in late 2014 was (at that time) located at a specified
 25 address in Everett, Washington, and that the DTO members drove specific vehicles that

26
 27 ¹ CS-6 has one felony conviction for Controlled Substance-Manufacturing/Delivery/Possession with Intent to
 28 Distribute. CS-6 has one Gross Misdemeanor conviction for Reckless Driving. CS-6's motivation in assisting law
 enforcement is to receive leniency on criminal sentencing, to receive immigration benefits and also monetary.

1 were parked at that address. Agents' surveillance observations confirmed and verified
2 these facts.

3 10. On a date in July, 2014, Investigators witnessed a Washington plated
4 vehicle arrive at this Everett stash house. Investigators saw a Hispanic male driver exit
5 the vehicle and enter the residence carrying a dark-colored duffle bag. Within an hour,
6 the same man was seen exiting the residence and then accessing the rear seat of the
7 vehicle. He then entered the vehicle and drove away.

8 11. Investigators followed it and requested that a Sheriff's Deputy conduct a
9 *Terry Stop* on the vehicle. A drug K-9 was applied to the vehicle and showed a positive
10 reaction/alert for the odor of narcotics. A Washington State search warrant was obtained
11 for the vehicle which resulted in finding a duffle bag in the rear seat containing \$200,080,
12 which was then seized. Within the stacks of currency a small baggy of suspected heroin
13 was located.

14 12. Through this seizure, Agents confirmed that the Target DTO is smuggling
15 illicit drug sale proceeds south from Washington State to Mexico. This is just one
16 example of similar conduct. To date, in the investigation of this Target DTO, over
17 \$800,000 in U.S. Currency has been seized during traffic stops linked to members of the
18 Target DTO.

19 13. In August, 2014, Investigators debriefed CS-6, during which he/she stated
20 the Target DTO Leader was going to rent or use a different location in order to store his
21 vehicles and load and unload contraband from smuggling vehicles. On September 2,
22 2014, Investigators followed the DTO Leader from the Everett stash house to a different
23 location in Everett, Washington, which has multiple buildings, with each building having
24 multiple units (hereinafter, Target DTO Leader Location).

25 14. After this happened, Investigators observed the Target DTO Leader at the
26 Target DTO Leader Location multiple times. Investigators also saw vehicles belonging
27 and registered to the Target DTO Leader parked at that location on a regular basis.
28

1 15. On a date in November, 2014, Investigators monitored CS-6 as he/she went
2 to the Target DTO Leader Location in Everett. Once there, the Target DTO Leader
3 invited CS-6 inside and the two spoke for some time. During that time, in pertinent part,
4 he told CS-6 that a load of heroin was due to arrive from Mexico that coming week. He
5 invited CS-6 to come get heroin once the incoming load of drugs arrived. This
6 conversation was recorded.

IDENTIFICATION OF BOJORQUEZ

9 16. On December 9, 2014, I drove by the Target DTO Leader Location. Parked
10 in front of the door was a white colored SUV, Washington License plate AST1649.
11 Surveillance showed this vehicle arrived at about 2:57pm. Two subjects exited the
12 vehicle and went inside. At approximately 6:11pm, this vehicle was seen leaving the
13 location.

14 17. A Washington State Department of licensing records check showed this
15 was a rental vehicle owned by EAN Holdings LLC out of Renton, Washington. This is
16 the name of a business to which rental vehicles owned by Enterprise, Alamo and National
17 car rental companies are registered.

18 18. Records obtained from National Car Rental show the vehicle was rented on
19 December 9, 2014 at the National Car Rental location in downtown Seattle, Washington,
20 and was scheduled to be returned to this location on December 11, 2014. The rental
21 record listed the renter as Raul BOJORQUEZ, later identified as Raul Andres
22 BOJORQUEZ via his Arizona Driver's License, and also identified as Raul Andres
23 BOJORQUEZ –Mimerza based on U.S. Immigration Records (hereinafter
24 BOJORQUEZ).

25 19. On December 11, 2014, I went to the National Car Rental location where
26 BOJORQUEZ was scheduled to return the vehicle and was advised it had been returned
27 the night prior at the SeaTac International Airport location.

1 20. Records checks on BOJORQUEZ revealed he had been contacted in the
 2 past by law enforcement attempting to smuggle marijuana into the United States and US
 3 Currency out of the United States without declaring it. In addition, records show
 4 BOJORQUEZ regularly crosses the US/ Mexican border and stays for short periods of
 5 time.

6 FINANCIAL INVESTIGATION OF BOJORQUEZ

7 21. The following information pertaining to the financial investigation was
 8 obtained from an experienced and specially trained financial investigator who has been
 9 conducting the financial records review in this investigation. According to the Bank
 10 Secrecy Act, Financial Institutions are required to report to FinCEN on a Currency
 11 Transaction Report (CTR) any deposit, withdrawal, exchange of currency, or other
 12 payment involving a cash transaction greater than \$10,000. The financial institution must
 13 record identifying information of the individual conducting the transaction, to include
 14 name, address, phone, DOB, SSN, occupation, and the number of identification
 15 presented, such as a driver's license or passport.

16 22. A records check of FinCEN revealed that between August 2014 and
 17 February 2016, BOJORQUEZ has conducted at least 317 cash deposits in amounts
 18 greater than \$10,000 in banks across the United States, generating a CTR by the financial
 19 institution. These CTR transactions total more than \$1.5 million.

20 23. Once these bank accounts were identified, additional records were
 21 requested via Grand Jury subpoenas, including surveillance photos of deposits when
 22 available. The retention period for bank surveillance photos varies between financial
 23 institutions, however typically is not more than 90 days. Therefore, photos of each
 24 deposit identified were not always available.

25 24. The additional bank records show additional cash deposits. For example,
 26 one account that BOJORQUEZ made a \$38,000 cash deposit to had an additional six
 27 cash deposits totaling \$39,970 within two months of the deposit made by BOJORQUEZ.
 28 Each of these six additional cash deposits, however, were in amounts less than \$10,000

1 and no surveillance photos were available, therefore it is unknown who conducted these
 2 transactions.

3 25. Further, BOJORQUEZ maintained at least two bank accounts in his name
 4 in 2014 and 2015. Deposits to his Wells Fargo Bank account totaled more than \$41,000
 5 in 2014, however, Wells Fargo has not provided items detailing the source of those funds.
 6 During 2015, at least \$10,700 in cash was deposited to the Washington Federal Bank
 7 account owned by BOJORQUEZ.

8 26. In August 2014, Currency Transaction Reports and surveillance photos
 9 show that BOJORQUEZ deposited a total of \$198,000 cash into five different Wells
 10 Fargo bank accounts over two different days. Each account was in a different person's
 11 name, and all transactions occurred in Washington State.

12 27. On November 5, 2014, bank records indicate that BOJORQUEZ deposited
 13 \$45,000 into a Wells Fargo account, which belongs to Monica Sanchez, a resident of
 14 Nogales, Sonora, Mexico at the Mill Creek, WA branch. Two days later, on November
 15 7th, BOJORQUEZ made three \$40,000 cash deposits at different Wells Fargo branches in
 16 Washington: Everett, Seattle, and Lynnwood. A surveillance photo of the cash deposit
 17 made at the Lynnwood branch confirms BOJORQUEZ as the depositor however a
 18 Currency Transaction Report could not be located. It is unknown how many additional
 19 cash deposits BOJORQUEZ may have conducted where the financial institution failed to
 20 file a CTR.

21 28. On November 10th, BOJORQUEZ made three additional cash deposits to
 22 three additional accounts, in the amounts of \$45,000, \$40,000, and \$40,000 respectively,
 23 in the Seattle area. For the \$40,000 deposit made at the Market Street branch,
 24 BOJORQUEZ provided his full name, no phone number, and date of birth of June 2nd to
 25 Wells Fargo. For the \$45,000 deposit made at the Queen Avenue branch, he provided his
 26 full name, phone number, and date of birth of February 6th. For the \$40,000 deposit at
 27 the Greenwood Avenue branch he provide the name Raul M Andres, his phone number,
 28 and a date of birth of February 6th. The changing or variations of information provided to

1 the financial institutions complicates the ability to search FinCEN for additional
 2 transactions. It is likely that additional transactions conducted by BOJORQUEZ exist,
 3 but have yet to be located based on the known name variations and information he has
 4 provided.

5 29. On December 8, 2014, BOJORQUEZ made three cash deposits totaling
 6 \$119,655 at the Glenview, IL branch of Wells Fargo, the Evanston, IL branch, and the
 7 Van Wert, OH, branch. For each of these transactions, he provided the name Raul A
 8 Mimerza to Wells Fargo.

9 30. On December 23, 2014, BOJORQUEZ deposited \$39,920 cash to the
 10 account of Jose Noriega at the Prospect, CT branch. The same day, BOJORQUEZ
 11 deposited \$40,000 cash to another account at the Middletown, CT branch and \$39,800 to
 12 a third account at the Rocky Hill, CT branch.

13 31. In December 2014 bank records indicate that BOJORQUEZ made nine
 14 deposits into various person's bank accounts at Wells Fargo banks in Ohio, Illinois,
 15 Washington, and Connecticut. These deposits totaled \$347,995.

16 32. During a trip in December 2014 to Washington, HSI Seattle Agents saw
 17 BOJORQUEZ at the Target DTO Leader's location in Everett. As described above, this
 18 location is used and controlled by the leader of the Target DTO, and he is known to
 19 distribute heroin from there.

20 33. On December 16, 2014, a Pen Register/ GPS Tracking order obtained in the
 21 Western District of Washington, United States District Court, for BOJORQUEZ's phone,
 22 520-906-0532. This phone number was the number he provided during numerous bank
 23 deposits. This is a cellular telephone with service provided by AT&T. The subscriber for
 24 the phone is Raul A. BOJORQUEZ at an address in Nogales, AZ. This account was
 25 established on 11/11/13.

26 34. On January 6, 2015, based on border crossing and flight records, Agents
 27 learned that BOJORQUEZ returned back into the US and flew from Tucson, AZ to
 28 Columbus, OH the next day.

1 35. On January 8, 2015, based on his cellular phone's GPS movement from
 2 Ohio to Chicago, agents suspect BOJORQUEZ acquired a rental car and drove to
 3 Chicago, IL. That same day, a Currency Transaction Report shows that a \$45,000 cash
 4 deposit was made to the Wells Fargo account of Juana Duran Villanueva at a branch in
 5 New Haven, IN, by an individual named Saul Andres Sandoval. The phone number
 6 provided by the depositor, 520-906-0532, is the number that has been used by
 7 BOJORQUEZ when he has made other large cash deposits. Further, bank surveillance
 8 photos confirm BOJORQUEZ was the individual making the deposit. The following day,
 9 a CTR shows that BOJORQUEZ went to a Wells Fargo in Elmhurst, IL and deposited
 10 \$44,000.00 to the account of Erika Acedo. Later, a CTR showed that he stopped at a
 11 Wells Fargo bank in Glenview, IL where he made another \$44,000.00 deposit to a
 12 different account. A review of Acedo's bank accounts revealed that \$178,120 in cash has
 13 been deposited to Acedo's account from September 2014 through January 2015, of which
 14 at least \$89,000 can be directly attributed to BOJORQUEZ.

15 36. Based on the data received on BOJORQUEZ's cell phone, HSI Agents
 16 learned that BOJORQUEZ left Arizona on the afternoon of February 16, 2015 and flew
 17 to Seattle, WA. Further, bank records show that he made a \$500 cash deposit to his own
 18 bank account in Lynnwood, WA on February 17, 2015.

19 37. On February 17, 2015, at about 2:44 p.m., BOJORQUEZ's phone's GPS
 20 showed him in downtown Seattle, Washington, near the Wells Fargo Bank located at
 21 Fourth Avenue and Pine Street. Special Agent Dahlstrom went to the Wells Fargo Bank
 22 and saw BOJORQUEZ, whom SA Dahlstrom recognized from BOJORQUEZ's U.S.
 23 Passport Application photo, walk out of that same Wells Fargo Bank lobby. SA
 24 Dahlstrom followed BOJORQUEZ to the bank garage and saw him get into 2015 silver
 25 Toyota Camry, Washington License Plate ASU8547. A records check on this vehicle
 26 showed it is a 2015 Toyota Camry silver in color registered to Dollar Rental Car. SA
 27 Dahlstrom was unable to maintain surveillance on BOJORQUEZ as he drove away.
 28

1 38. Wells Fargo Bank records reveal that a \$40,000 cash deposit was made on
 2 February 17, 2015 to the account of Rosalia Perez Castillo, an individual with an address
 3 in Mexico. The deposit was conducted at the Fourth Avenue branch in Seattle, and
 4 depositor was identified by Wells Fargo as Saul Andres Lopez. Based on the name
 5 similarity and date of birth provided, this is believed to be BOJORQUEZ.

6 39. The same day, five cash deposits totaling \$48,000 were made to the Wells
 7 Fargo Bank account of Luz D Chavez in ID, CO, KS, and WA. A CTR was filed,
 8 however no depositor information was recorded. Surveillance photos show that one of
 9 the deposits made at the Lynnwood branch of Wells Fargo was conducted by
 10 BOJORQUEZ.

11 40. Later, at about 7:50 p.m., based on BOJORQUEZ's phone's GPS, Agents/
 12 Officers re-located the Toyota Camry at a restaurant in Tukwila, Washington and later
 13 followed him to a nearby hotel.

14 41. On February 18, 2015, Agents/ Officers began surveillance again on
 15 BOJORQUEZ's rental vehicle at the hotel. At about 9:16 a.m., SA Gallegly observed
 16 BOJORQUEZ walk to his rental vehicle, place bags in the trunk, get inside the driver's
 17 seat and leave.

18 42. Throughout the day on February 18, 2015, Agents/ Officers observed that
 19 BOJORQUEZ made a total of nine trips to various Wells Fargo Banks and one trip to a
 20 Washington Federal Bank in the greater Seattle area. In at least two of these trips, agents
 21 believe that BOJORQUEZ deposited large amounts of currency into accounts belonging
 22 to people other than BOJORQUEZ. In one instance, bank records showed BOJORQUEZ
 23 deposited \$20,500 cash to a Wells Fargo account in the name of Rosalia Perez Castillo.
 24 This deposit was made at the Tukwila, Washington branch located at 343 Andover Park
 25 East. This is one of the locations Agents/ Officers had followed BOJORQUEZ to on this
 26 date.

27 43. When BOJORQUEZ left the last bank, Agents/ Investigators followed him
 28 directly to the Rental Car return at SeaTac Airport. There, he returned the car, went to

1 the terminal and purchased a plane ticket with cash. Investigators learned that he had
2 bought a ticket for the next flight to Phoenix, Arizona. BOJORQUEZ was observed
3 passing through security and into the boarding area. Surveillance was discontinued at
4 this point.

5 44. In March 2015, BOJORQUEZ and two others flew together to Cleveland,
6 Ohio. There, HSI Cleveland Agents were able to conduct surveillance and observed that
7 they all stayed in the same hotel room. Agents were unable to identify what, if any
8 illegal activity transpired but believe this two-day trip to Cleveland in March was not for
9 pleasure. Agents believed that at one point that possibly BORJORQUEZ had identified
10 that he was being followed as he began driving erratically and surveillance was
11 terminated. Records show that BOJORQUEZ returned to Arizona on March 4, 2015.

BORJOQUEZ'S INTERVIEW

13 45. In March 2015, shortly after his trip to Ohio where agents believed
14 BOJORQUEZ had detected being followed, BOJORQUEZ was interviewed by Border
15 Patrol and Homeland Security Agents/ Investigators in Nogales, Arizona.

16 46. During this interview, in pertinent part, BOJORQUEZ admitted working
17 for a Money Laundering Organization as a courier, laundering drug proceeds.
18 BOJORQUEZ said once the courier obtains the cash proceeds from a local drug
19 trafficking organization, the courier then deposits the money as directed by the leaders of
20 the MLO. BOJORQUEZ said Wells Fargo banks are the only banks that will allow
21 deposits to be made into an account by a person other than the account holder.
22 BOJORQUEZ said all accounts used by this MLO are held by people who live in
23 Mexico. Those involved in the MLO pay individuals to keep these accounts.
24 Investigators have confirmed that most of the accounts used by the MLO are in-fact
25 owned by people who reside in Mexico. Looking at the pattern of activity of some of the
26 involved accounts, the accounts are opened with small amounts of money. A large cash
27 deposit (typically, around \$40,000) is made into the account, usually in another state.

1 Shortly thereafter, the money is either withdrawn in a state along the U.S./Mexican
2 border, or transferred to another account and/or wire transferred to accounts in Mexico.

3 47. BOJORQUEZ admitted conducting this money laundering activity, on
4 behalf of the MLO, in the Seattle, Washington, area and other regions around the United
5 States.

BOJORQUEZ RESUMES WORKING FOR THE MLO

8 48. Following this interview, after several months of not seeing any banking
9 activity by BOJORQUEZ, in January 2016, Investigators found additional Currency
10 Transaction Reports indicating seven cash deposits made by BOJORQUEZ, providing his
11 full name and phone number as the depositor, in various Wells Fargo banks in several
12 different parts of New York between January 19 and 20, 2016. The total amount for
13 these deposits was \$263,700. As in previous deposits by BORJORQUEZ, the deposits
14 were made into various accounts in other persons' names and for even dollar amounts.
15 The telephone number BOJORQUEZ gave to the banks while making these deposits was
16 also the same that he had been using since 2014, 520-906-0532.

17 49. In February 2016, based on Currency Transaction Reports filed with
18 FinCEN, it appears as if BOJORQUEZ returned to New York. Between February 2 and
19 4, 2016, he made four separate deposits totaling \$149,000 at Wells Fargo Banks in New
20 York, New York. These deposits were respectively for \$38,000, \$40,000, \$40,000, and
21 \$31,000. Two of these deposits, totaling \$71,000, were into an account belonging to
22 Carlos Abraham Ladslao Alvarez and the other two deposits were into accounts
23 belonging to Carlos A. Sanchez and Cesar E. Ruiz-Gaxiola. All account holders have
24 Mexico based phone numbers.

25 50. On February 11th and 12th, 2016, CTRs show that BOJORQUEZ made an
26 additional six cash deposits totaling \$240,000 at different Wells Fargo Bank branches in
27 the New York area. One deposit was made on the 11th and the other five deposits were
28 made on February 12, 2016. As of February 24, 2016, the February 12th transactions are

1 the latest available records in FinCEN. It is unknown if BOJORQUEZ has conducted
 2 any bank transactions in the past two weeks.

3 **BOJORQUEZ RETURNS TO WASHINGTON IN FEBRUARY, 2016**

4 51. On February 24, 2016, BOJORQUEZ arrived in Seattle, Washington. On
 5 February 25, 2016, agents observed him meet with three unknown Hispanic males in
 6 Marysville, Washington. Later that same day, agents observed him meet an unknown
 7 female in Lynnwood, Washington, and saw her place a bag into his car. He was arrested
 8 later that night and agents seized a large quantity of currency (which has not yet been
 9 counted) that he had received during these two meetings.

10 **THE MONEY LAUNDERING ORGANIZATION**

11 52. In reviewing bank records tied to BOJORQUEZ and others, the financial
 12 investigator working on this investigation has identified numerous Wells Fargo Bank
 13 accounts that appear to have been used by the MLO as recipient accounts in which
 14 couriers have been making their deposits. The majority of these accounts are owned by
 15 subjects who reside in Mexico.

16 53. Bank records indicate that several different couriers have been identified as
 17 making deposits into these accounts at various Wells Fargo Banks across the United
 18 States. Thereafter, records indicate the money is either immediately wired to individuals
 19 in Mexico or withdrawn in cash by the account holder at branches along the US side of
 20 the Mexico border. Presumably, it is then smuggled back to the members of the
 21 originating DTO, or someone else on their behalf, in Mexico.

22 54. Agents/ Investigators believe BOJORQUEZ and other couriers are
 23 travelling into the United States to different cities and states in order to collect illicit drug
 24 sale proceeds and structure their deposits into different banks branches, and into multiple
 25 accounts in the names of multiple different people, in order to launder the money for
 26 Mexican DTOs. Specifically, by sending outside couriers to make the cash deposits, and
 27 depositing the funds into numerous different accounts in different names, the funds can
 28 be transferred to Mexico or nearer to the Mexican border in a manner that fully conceals

1 their true ownership and control (by the DTO), and disguises the illegal source of the
2 funds. Once split into these various accounts in the names of Mexican individuals who
3 are not involved in the DTO's activities in the United States, the funds can be withdrawn
4 or wire transferred as directed and returned back to the DTO in Mexico, all without ever
5 generating a record of the DTO's actual ownership and control of the funds and without
6 any official records of the illegal source of the funds.

7 55. To date, millions of dollars in deposits have been identified as having been
8 laundering by this MLO in this manner since April 2014. Investigators believe this
9 money is drug proceeds, collected and laundered on behalf of various DTOs by the
10 Money Laundering Organization for which BOJORQUEZ works as a courier. Of this
11 money, over \$1.5 million dollars can be traced directly to deposits made by
12 BOJORQUEZ.

Conclusion

14 56. Based on the above facts, I respectfully submit that there is probable cause
15 to believe that RAUL BOJORQUEZ did knowingly and intentionally conspire with other
16 members of the MLO and members of the client DTOs to commit money laundering, in
17 violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(h), and
18 other related statutes.

Nicole Richardson, Complainant
Task Force Officer
Homeland Security Investigations

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

Dated this 24 day of February, 2016.

Mary Alice Theiler
The Hon. Mary Alice Theiler
United States Magistrate Judge

COMPLAINT/BOJORQUEZ- 17

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